

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

GERARD LAFFAN, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

SANTANDER BANK, N.A., et al.

Defendants.

Civil Action No. 5:13-CV-04040-JLS

**PLAINTIFF'S UNOPPOSED MOTION FOR
AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES,
AND APPROVAL OF SERVICE AWARD TO PLAINTIFF**

Plaintiff Gerard Laffan, on behalf of himself and all others similarly situated, ("Plaintiff"), respectfully submits his Unopposed Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Approval of Service Award to Plaintiff. In support thereof, Plaintiff has contemporaneously filed a Memorandum of Law and the Declaration of Peter A. Muhic, with exhibits thereto. Defendants Santander Bank, N.A., American Modern Insurance Group, Inc., and Atlas Insurance Agency, Inc. do not oppose Plaintiff's requested relief contained therein.

For the reasons set forth in the attached memorandum of law, Plaintiff respectfully requests that the Court grant his Unopposed Motion, and enter the accompanying [Proposed] Order Granting an Award of Attorneys' Fees, Reimbursement of Expenses, and Approval of Service Award to Named Plaintiff

Dated: October 30, 2015

Respectfully submitted,

**KESSLER TOPAZ
MELTZER & CHECK, LLP**

s/ Peter A. Muhic

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*Attorneys for Plaintiff and
The Proposed Class*

CERTIFICATE OF UNCONTESTED MOTION

Pursuant to Local Rule 7.1(b), the undersigned hereby certifies that the foregoing Unopposed Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Approval of Service Award to Named Plaintiff is uncontested by Defendants Santander Bank, N.A., American Modern Insurance Group, Inc., and Atlas Insurance Agency, Inc.

Dated: October 30, 2015

s/ Peter A. Muhic

Peter A. Muhic (PA 73501)

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of October 2015, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

s/ Peter A. Muhic

Peter A. Muhic (PA 73501)